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WATANABE ING LLP
A Limited Liability Law Partnership

SETH M. REISS #2774-0
SUMMER H. KAIAWE #9599-0
First Hawaiian Center
999 Bishop Street, Suite 1250
Honolulu, Hawaii 96813
Telephone: (808) 544-8300
Facsimile: (808) 544-8399
E-mails: sreiss@wik.com
skaiaawe@wik.com

Attorneys for Defendant
HAWAIIAN SPRINGS, LLC

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

VINCENT KHOURY TYLOR,

Plaintiff,

vs.

HAWAIIAN SPRINGS, LLC, a
Delaware Limited Liability Company;
JOHN DOES 1-10; JANE DOES 1-10;
DOE CORPORATIONS 1- 10; DOE
PARTNERSHIPS 1-10; and
DOE ASSOCIATIONS 1-10,

Defendants.

CIVIL NO. 17-00290 HG-KJM
(Copyright Infringement)

DEFENDANT HAWAIIAN
SPRINGS, LLC'S **MOTION TO
COMPEL DISCOVERY;**
MEMORANDUM IN SUPPORT OF
MOTION; DECLARATION OF
SETH M. REISS; EXHIBITS "A"-
"D"; CERTIFICATE OF
COMPLIANCE; CERTIFICATE OF
SERVICE

NON-JURY TRIAL: 9/24/2019

**DEFENDANT HAWAIIAN SPRINGS, LLC'S
MOTION TO COMPEL DISCOVERY**

Defendant HAWAIIAN SPRINGS, LLC (“Hawaiian Springs”), by and through its attorneys, WATANABE ING LLP, hereby moves this Honorable Court pursuant to Rules 30, 33, 34, and 37 of the Federal Rules of Civil Procedure (the “FRCP”) and Local Rule 37.1, for an order compelling discovery.

Notwithstanding Hawaiian Spring’s good faith efforts to secure the information and documents sought by discovery without court action, Plaintiff VICENT KHOURY TYLOR (“Plaintiff”) refuses to (1) provide information regarding revenues obtained from analogous third party claims, (2) identify third party websites of which Plaintiff is aware that exhibit or previously exhibited unauthorized copies of the photographs that Hawaiian Springs is accused of infringing, and (3) agree that Hawaiian Spring’s insurer be included among those to whom confidential documents and information may be disclosed.

This Motion is supported by the attached Memorandum in Support of Motion, Declaration of Seth M. Reiss, Exhibits “A” through “D”, further argument to be presented at the hearing of the Motion, and the entire records and files herein.

DATED: Honolulu, Hawaii, April 23, 2019.

/s/ Seth M. Reiss

SETH M. REISS, ESQ.
SUMMER H. KAIAWE, ESQ.
Attorneys for Defendant
HAWAIIAN SPRINGS, LLC